

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:

LARA ALANA D'ANE BLAIR

SSN: ###-##-9745

) BK. NO. 11-82352-TLS

)

) CHAPTER 13

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Debtor.

STIPULATION REGARDING RESOLUTION OF TRUSTEE'S NOTICE OF PAYMENT DEFAULT

COMES NOW, Kathleen A. Laughlin, Chapter 13 Trustee and the Debtor, by and through undersigned attorney and agree to resolution of the Trustee's Notice of Payment Default as follows:

The Debtor agrees as follows [Mark an "X" by the appropriate item and note the date by which the required action will take place]:

- 1. No later than 11/24, 2014 the debtor agrees to cure the delinquent plan payments as well as pay all regular plan payments due through the above date. [Note: the Trustee will not agree to any extension to cure of more than 60 days].
- 2. The debtor will file a Limited Motion to Modify the Chapter 13 Plan After Confirmation pursuant to Neb. R. Bankr. P. 3015-3(B), no later than _____, 20____.
- 3. The debtor will file an Amended Plan no later than _____, 20____ and obtain timely approval or confirmation of the amended plan to cure the delinquent payments.
- 4. The debtor will file a Motion to Convert no later than _____, 20____.

[The Trustee will only agree to an amended plan, Limited Motion to Modify or an agreement to file a motion to convert that is to be filed within 30 days of the date that this stipulation is signed by the debtor's attorney. The Trustee will not enter into a stipulation if it is not signed and dated by the debtor's attorney and transmitted to the Trustee within two weeks of the issuance of the Trustee's Notice of Payment Default.]

DEBTOR AGREES AND UNDERSTANDS THAT IF THE ACTION WHICH THEY HAVE AGREED TO TAKE ABOVE DOES NOT OCCUR, THEN THE TRUSTEE WILL FILE A DECLARATION WITH THE COURT REQUESTING DISMISSAL OF THIS CASE. THIS STIPULATION DOES NOT AFFECT THE RIGHT OF ANY OTHER PARTY IN INTEREST TO SEEK DISMISSAL OF THIS CASE OR RELIEF FROM THE AUTOMATIC STAY.

Dated 11.12.14

Signed

Erin M. McCartney
ERIN M MCCARTNEY,
Attorney for the Debtor

Dated 11/17/14

/s/ Marilyn N. Abbott for
Kathleen A. Laughlin, Chapter 13 Trustee

[Debtor's counsel should fax this proposed stipulation to the Trustee's Office at fax # 1-402-530-1869.]

[To ERIN M MCCARTNEY, Attorney for the Debtor]

The Trustee declines to enter into the above Stipulation for the following reasons:

Dated _____

Kathleen A. Laughlin,
Chapter 13 Trustee

11/12/14 [Signature]